



Louise L. M. Tucker
Senior Counsel
Washington

Telcordia Technologies, Inc.
2020 K Street NW Suite 400
Washington, DC 20006
Voice: (202) - 530-8934
Fax: (202) 776-5425
Email: ltucker@telcordia.com

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February 2, 2004,

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W. TW-A325
Washington, D.C. 20554

Re: Ex Parte Presentation in CG Docket No. 95-116

Dear Ms. Dortch:

On January 30, 2004, Marybeth DeGeorgis, Adam Newman, Michael Slomin and the undersigned, met with the following members of the Wireline Competition Bureau's Telecommunications Access Policy Division: Cheryl Callahan, Assistant Chief, Pam Slipakoff, Sanford Williams, and Scott Mackoul .

The purpose of the meeting was to discuss access to NPAC data as explained in the attached PowerPoint slides.

Pursuant to 47 C.F.R. § 1.49(f), this *ex parte* letter will be filed electronically for inclusion in the public record of the above-referenced proceeding, in accordance with 47 C.F.R. § 1.1206(b)(2).

Sincerely,

Louise L. M. Tucker



Need for NPAC Data Validation Information

Telcordia Contact:

Marybeth C. Degeorgis

732-758-4961

mdegeorg@telcordia.com

January 31, 2004

Industry Need for Data Validation

The telecommunications industry relies on complete, accurate, and consistent data for purposes of routing , rating and billing of customer call traffic. The Telcordia® Routing Administration (TRA) plays a pivotal role in these operations.

- TRA customers require multiple data comparison and discrepancy reports as an operational tool in validating Operational Support System (OSS) outputs
- TRA provides industry database discrepancy reports (e.g. BIRRDS/NECA BIRRDS/Common Language®, BIRRDS/NANPA comparison data) to a multitude of industry users
- To further ensure accurate and consistent routing, rating and billing data, TRA has been asked to expand its data comparison reports to include BIRRDS/NPAC comparison data. In order to comply with this industry request, we have been asking for over a year to receive certain NPAC data elements:
 - LRN
 - NPA-NXX
 - NPA-NXX-X
 - Customer ID (SPID) and Company Name

The accuracy of this data has become even more critical since the November 24, 2003 implementation of Wireless Number Portability

Data Exchange Request History

Telcordia TRA industry representatives have been painstakingly pursuing a BIRRDs-NPAC data exchange through established industry methods and numbering bodies for over one year.

- In September 2002, TRA and NPAC identified industry needs for mutual data access for purposes of routing, rating and billing data validation. The LNPA co-chairs proposed an “exchange” of data in an effort to minimize costs to the industry.
- Since March, 2003 TRA has been providing data to the NPAC for use by the industry.
- The associated TRA request for data to the NPAC Administrator (NeuStar) was denied, and TRA was directed to the LNPA-WG for resolution.
- LNPA-WG Chairs then advised TRA to submit a PIM representing TRA user request for NPAC data in order to provide BIRRDs-NPAC data discrepancy reports. After attending seven consecutive LNPA-WG meetings, and responding to multiple LNPA-WG homework assignments, consensus could not be reached to accept the TRA user group PIM. In August, 2003, the TRA user group was advised to consider addressing its data needs in “some other way” or to attempt rewriting and re-submitting the PIM at a later date.
- To meet the needs of its users and in the interest of industry-wide data accuracy, TRA submitted an NPAC New User Application to NeuStar in September, 2003.
- Again, this was followed by four months of follow-up correspondence, conference calls and telephone contacts.
- On January 15, 2004 NeuStar advised Telcordia TRA that its application had been denied by the NAPM LLC, as Telcordia TRA is considered a “non-standard user of NPAC data”, and that our request represented “non-standard use” of this data. The LLC referenced plans to undertake a study regarding such use, however, a timeframe has not been determined.

Telcordia believes that it is not a non-standard user, but even if it were, it is important to note that other similarly situated entities have been granted access to NPAC data.

Why Grant TRA an NPAC User Agreement

The Telcordia® Routing Administration (TRA) service provider customers have a legitimate need for the comparison of certain NPAC and TRA data.

- We at TRA have an in-depth understanding of the industry need for access to accurate and consistent routing, rating and billing data, and we are simply attempting to continue our long and successful history of providing this information to all industry users.
- Service Providers have invested tens of millions of dollars in their back-office Operational Support Systems, many of which rely on the accuracy of TRA data. Denial of our NPAC User Application is preventing us from meeting our customer requirements.
- The TRA intent for use of NPAC data clearly falls within the provisions of the existing NPAC User Agreement (Article 7 ‘Obligations of User’, Section 7.6) as it is “for the purpose of routing, rating, or billing calls or performing network maintenance in connection with the provision of telecommunications services”.

Contrary to our experience with NPAC, it should be noted that TRA provides data to industry users in a neutral and unbiased manner, including the NPAC, NANPA and PA – all NeuStar entities.

How the FCC can Help

- **Telcordia® Routing Administration (TRA) requests that the LLC and NPAC be directed to provide TRA the NPAC data that is required for routing, rating, billing and performing network maintenance in connection with provision of telecommunications services.**
- **Failing that, TRA urgently requests interim relief in the form of NPAC data access/downloads while the NAPM LLC conducts their “non-standard user/use” study or other industry groups consider such matters.**
- **TRA also respectfully requests that the FCC review the methods and procedures followed by the NAPM LLC, the LNPA-WG and NPAC Administrator to ensure neutral and fair treatment for all telecommunications industry participants.**